

**FINAL
CEQA INITIAL STUDY
MITIGATED NEGATIVE DECLARATION**

COUNTY OF ORANGE WORKFORCE REENTRY CENTER PROJECT

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

NO. PP-24-0119

SCH NO. 2025060043

Prepared for:



**County of Orange
County Executive Office/Real Estate/Land Development
OC Facilities Design & Construction Management
400 W. Civic Center Drive, 5th Floor
Santa Ana, California 92701**

Prepared by:

**LSA Associates, Inc.
3210 El Camino Real, Suite 100
Irvine, California 92602**

July 2025

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Chapter 1: Introduction

1.1 Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines (*State CEQA Guidelines*) Section 15074, the County of Orange (County), as the Lead Agency, must consider the Initial Study and Mitigated Negative Declaration (IS/MND) for the County of Orange Workforce Reentry Center Project (proposed project) together with any comments received during the public review process. Responses have been prepared to the comments received during the public review period.

This document comprises the Final IS/MND for the proposed project. It includes the comments received during the public review period, responses to the comments, and an Errata section that clarifies, amplifies, or makes minor modifications to the Draft IS/MND text. The Draft IS/MND and technical appendices are provided in Appendix A.

While information provided in this Final IS/MND revises the Draft IS/MND, no substantive changes have been made to the information contained in the Draft IS/MND as a result of the comments received on the Draft IS/MND, and no significant new information has been added that would require recirculation of the document pursuant to *State CEQA Guidelines*, Section 15088.5.

1.2 Project Site Location

The proposed Workforce Reentry Center Project (project) would be located at 561 The City Drive South in the Orange, Orange County, California.

1.3 Proposed Project

The County of Orange proposes to develop a Workforce Reentry Center (proposed project) on an approximately 4.6-acre property at 561 The City Drive South in Orange (Assessor's Parcel Numbers 231-091-02, 231-091-03, 231-091-07, 231-091-09, and 231-271-02). The proposed project would provide transitional housing and vocational training for adult individuals involved in the criminal justice system or other County systems of care to facilitate their transition into the workforce. The proposed project would develop the project site with three buildings: a 37,200-square-foot office/vocational building, a 16,166-square-foot retail/culinary building, and a 26,998-square-foot supportive housing and services building. Ancillary site improvements would include utility infrastructure connections/relocations, landscaping, and hardscaping, including surface parking and a new internal circulation roadway. Minor off-site improvements are proposed for The City Drive South and West Metropolitan Drive to improve vehicular access to the project site, including traffic signal modifications, restriping, and median modifications. Construction activities associated with the proposed project would include excavation, reaching a maximum depth of 16 feet below ground surface.

An IS/MND has been prepared for the proposed project in accordance with *State CEQA Guidelines* Section 15070.

1.4 CEQA Requirements

State CEQA Guidelines Section 15204(b) states that "persons and public agencies should focus on the proposed finding that the project will not have a significant effect on the environment. If persons and

public agencies believe that the project may have a significant effect, they should: identify the specific effect; explain why they believe the effect would occur; and explain why they believe the effect would be significant.”

The County provided the mandatory 30-day period for public and agency review. In addition, in compliance with the Governor’s Executive Order No. N-54-20, Section 8(b), the Notice of Intent to Adopt a Mitigated Negative Declaration and proposed IS/MND were uploaded to the State Clearinghouse (SCH) CEQAnet Web Portal via CEQA Submit. The State Clearinghouse assigned SCH No. 2025060043 to the proposed project.

The Notice of Intent to Adopt a Mitigated Negative Declaration and proposed IS/MND with supporting attachments were available for review by the general public at:

- County of Orange, OC Public Works Development Services/Planning Website: <https://ocds.ocpublicworks.com/service-areas/oc-development-services/planning-development/current-projects/2nd-district/County-of-Orange-Workforce-Reentry-Center-Project>
- CEQAnet Web Portal on the Governor’s Office of Land Use and Climate Innovation Website: <https://ceqanet.lci.ca.gov/>

In addition to the two online locations identified above, the public Notice of Intent to Adopt a Mitigated Negative Declaration was also provided in the following manner:

- Filed and posted by the Orange County Clerk-Recorder from June 2, 2025, through July 2, 2025;
- Available to view at the County Administrative South building (OC Public Works Counter) at 601 North Ross Street in Santa Ana, California, from June 2, 2025, through July 2, 2025; and
- Posted on site at 561 The City Drive South, in Orange, California.

1.5 Index of Comments Received

The following is an indexed list of the agencies and individuals that commented on the Draft IS/MND. The comments received have been organized in a manner that facilitates finding a particular comment or set of comments. Each comment letter received is indexed or coded with a number as shown in Table 1 below.

Table 1: Comments Received During the Public Comment Period

Comment Code	Signatory	Date
State Agency		
S-1	California Department of Transportation (Caltrans) District 12	7/2/2025
Local Agencies		
L-1	Orange County Fire Authority (OCFA)	6/18/2025
L-2	City of Orange	7/1/2025

1.6 Format of Responses to Comments

Responses to the indexed/coded comment letter are provided on the following pages. A comment index code number is provided in the upper right corner of the comment letter, and individual comments within each letter are numbered along the right-hand margin of each letter. The County’s responses to the comments immediately follow the letter and are referenced by the index numbers in the margins.

While none of the comments received contained any substantive information or questions about the environmental analysis or conclusions contained in the Draft IS/MND, minor revisions have been made to the Draft IS/MND as a result of updates to the proposed construction schedule. Therefore, information provided in this Final IS/MND clarifies, amplifies, or makes minor modifications to the Draft IS/MND. No significant new information has been added that would require recirculation of the document pursuant to *State CEQA Guidelines* Section 15088.5. A revised version of the Draft IS/MND has been prepared to make minor corrections and clarifications to the Draft IS/MND. Therefore, this Final IS/MND includes an Errata to the Draft IS/MND (with strikethrough and underline showing changes from the original text), written comments received on the Draft IS/MND, and responses to those comments. Refer to Section 3.0 for the Errata.

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Chapter 2: Responses to Comments

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2.1 State Agencies

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California Department of Transportation

WORK

DISTRICT 12

1750 East 4th Street, Suite 100 | SANTA ANA, CA 92705

(657) 328-6000 | FAX (657) 328-6522 TTY 711

<https://dot.ca.gov/caltrans-near-me/district-12>

July 2, 2025

Mr. Ryan Rigali
Real Estate Administrator
County of Orange
400 W. Civic Center Dr,
5th Floor
Santa Ana, CA. 92701

File: LDR/CEQA
SCH: 2025060043
12-ORA-2025-02849
SR-22 PM R9.749

Dear Ms. Rigali,

Thank you for including the California Department of Transportation (Caltrans) in the review of the Mitigated Negative Declaration (MND) for the County of Orange Workforce Reentry Center Project. The County of Orange (County) proposes to develop a Workforce Reentry Center (project) on an approximately 4.6-acre property at 561 The City Drive South in Orange, California (Assessor's Parcel Numbers 231-091-02, 231-091-03, 231-091-07, 231-091-09, and 231-271-02). The proposed project would provide transitional housing and vocational training for adult individuals involved in the criminal justice system or other County systems of care to facilitate their transition into the workforce. The proposed project would develop the project site with three buildings: a 37,200-square-foot office/vocational building, a 16,166-square-foot retail/culinary building, and a 26,998-square-foot supportive housing and services building. Ancillary site improvements would include utility infrastructure connections/relocations, landscaping, and hardscaping, including surface parking and a new internal circulation roadway. Minor off-site improvements are proposed for The City Drive South and West Metropolitan Drive to improve vehicular access to the project site, including traffic signal modifications, restriping, and median modifications.

The project is located at 561 The City Drive South in Orange, California. The project site is bounded by the Santa Ana River to the east, the Theo Lacy Facility to the north, a vacant strip of State-owned land and State Route (SR-) 22 to the south, and The City Drive South to the west. State Route 22 is owned and operated by Caltrans. Therefore, Caltrans is a commenting agency on this project, and has the following comments:

1. Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable “smart growth” type land use planning and policies.
2. Caltrans encourages the design of Complete Streets that include high-quality pedestrian, bicycle, and transit facilities that are safe and comfortable for users of all ages and abilities. This may include safety measures such as physically separated sidewalks and bike lanes, pedestrian-oriented LED lighting, high-visibility continental crosswalk striping, raised crosswalks, refuge islands, wayfinding signage, and safe connections to existing and proposed bicycle facilities. Complete Streets improvements also promote regional connectivity, improve air quality, reduce congestion, promote improved first-/last-mile connections, and increase safety for all modes of transportation.
3. Caltrans supports the project's inclusion of secure and functional short- and long-term bike parking. Short-term bike parking should be placed on the ground floor in visible areas that are close to main entrances and should be installed at least 24" away from walls and other objects (e.g. trash cans, plants, etc.). Both short- and long-term bike parking should be designed to accommodate different types of bikes (e.g. cargo bike, bike with trailer).
4. For additional guidance on providing functional bike parking, see the attached “Essentials of Bike Parking” guidance created by the Association of Pedestrian and Bicycle Professionals (link to online PDF: <https://www.apbp.org/Publications>).
5. During any future construction, please ensure that appropriate detours and safety measures are in place that prioritize the mobility, access, and safety of bicyclists, pedestrians, and transit users.
6. Encourage the use of transit among future residents, visitors, and workers of the proposed areas of developments. Increasing multimodal transportation will lead to a reduction to congestion, Vehicle Miles Traveled and improve air quality.

S-1-2

S-1-3

S-1-4

S-1-5

S-1-6

S-1-7

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 7. The lane widths for the built-out condition in the TIA needs to reflect the lane widths as shown on the built-out plans. The information needs to be consistent. Please address and make the needed corrections. | S-1-8 |
| 8. Please explain why the Peak Hour Factors that were illustrated were not used as shown in the traffic counts. Was there a reason for the inconsistency? | S-1-9 |
| 9. Please provide a traffic weaving analyses on the EB SR 22 segment between The City Dr interchange and the connector to I-5/ NB SR 57. | S-1-10 |
| 10. Please review and correct the geometry on EB and WB Metropolitan Dr and the proposed Driveway. The approach and departure lane at the Metropolitan Dr/City Dr intersection does not line up. | S-1-11 |
| 11. If future impact analysis leads to findings of significance on State facilities, please coordinate with Caltrans District 12 Local Development on development of a Traffic Mitigation Agreement or similar effort. | S-1-12 |
| 12. Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Prior to submitting to Caltrans Permit's branch, applicant should fill out Applicant's Checklist to Determine Applicable Review Process (QMAP List) Form TR-0416 to determine if project oversight/coordination with Caltrans Project Manager is needed. Applicant must submit a signed Standard Encroachment Permit application form TR-0100 along with a deposit payable to Caltrans. Deposit amount will be dependent on when the application is submitted. Public corporations are legally exempt from encroachment permit fees. However, contractors working for public corporations are not exempt from fees. Please note that all utility work should be disclosed prior to permit submittal, and utility companies are to apply for separate permits for their corresponding work. | S-1-13 |
| 13. Project plans and traffic control plans must be stamped and signed by a licensed engineer. For all plans, including traffic control plans, Caltrans R/W lines should be clearly labeled, which includes existing and proposed (if there are any changes to Caltrans R/W), the north arrow, the edge of pavement, and edge of the sidewalk, if applicable. When submitting the application, please include final Environmental Clearance | S-1-14 |

Documentation, relevant design details including design exception approvals and construction and drainage plans, traffic control plans, traffic management plan and traffic impact study if proposed traffic delay of 30 minutes above normal recurring traffic delay is anticipated, any Caltrans R/W certifications if needed, maintenance agreement as needed, shoring plans for any excavation 5-feet or more, ADA certification, and any letter of authorizations.

S-1-14

14. Please submit all applications and associated documents/plans via email to D12.Permits@dot.ca.gov until further notice. Caltrans Encroachment Permits will be transitioning to an online web portal base for all applications in Fall 2023. Further details to be announced on the Caltrans Encroachment Permits homepage. Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (657) 328-6246. For specific details on Caltrans Encroachment Permits procedure and any future updates regarding the application process and permit rates, please visit the Caltrans Encroachment Permits homepage at <https://dot.ca.gov/programs/traffic-operations/ep>.

S-1-15

Caltrans' mission is to improve lives and communities through transportation. Please continue to coordinate with Caltrans for any future developments that could potentially impact State transportation facilities. If you have any questions, please do not hesitate to contact Julie Lugaro at Julie.lugaro@dot.ca.gov.

S-1-16

Sincerely,


Scott Shelley (Jul 2, 2025 15:47 PDT)

Scott Shelley
Branch Chief,
Local Development Review-Climate Change-Transit Grants
Caltrans, District 12

2.1.1 California Department of Transportation (Caltrans) District 12

Letter Code: S-1

Date: July 2, 2025

Response to Comment S-1-1

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Response to Comment S-1-2

As discussed in Section 4.21 of the Draft IS/MND, the proposed project would house up to 54 people on site, of which approximately 40 percent could have jobs off site. However, the proposed project also provides on-site vocational training, therefore reducing the need for resident program participants to travel to and from the project site. In addition, it is assumed that roughly half of the individuals housed on site would likely not have a car and would utilize other means of transportation, including walking, bicycling, and using transit. The project site is highly accessible via transit due to its proximity to several Orange County Transportation Authority (OCTA) bus stops. The closest bus stop to the project site is located along the northern curb of West Metropolitan Drive, approximately 250 feet from the project site. Further, the project site is located in close proximity to the Santa Ana River Trail, which is classified as a Class I bicycle path along the Santa Ana River. The proposed project would provide bicycle parking to accommodate individuals choosing to utilize this alternative mode of transportation. Further, proposed on-site improvements under the proposed project would include new internal circulation sidewalks surrounding and between the proposed buildings to ensure safe pedestrian access throughout the project site. Lastly, the proposed project is presumed to have a less than significant impact under CEQA related to vehicle miles traveled (VMT). No further response is required.

Response to Comment S-1-3

As stated in Section 4.21 of the Draft IS/MND, the proposed project would accommodate and encourage the use of pedestrian, bicycle, and transit facilities. As discussed above, the proposed project would not interfere with existing pedestrian, bicycle, or transit facilities. Pedestrian facilities improvements include signalization of the main project driveway, located at the intersection of The City Drive South and West Metropolitan Drive, which would include a pedestrian walk sign to ensure safe pedestrian crossings from between the north and south ends of the driveway. No further response is required.

Response to Comment S-1-4

The proposed project would provide bicycle parking consistent with the requirements set forth in Section 5.106.4. of the 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen), as amended. Specifically, twelve (12) short-term bicycle parking stalls and nine (9) long-term bicycle storage lockers are proposed on the project site. These would be available for use by employees or residents, who may use bicycles as a form of transportation. No further response is required.

Response to Comment S-1-5

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Response to Comment S-1-6

As stated in Section 4.21 of the Draft IS/MND, the proposed project is not expected to result in substantial traffic impacts or queueing on nearby streets during construction, as all equipment would be staged within the project site. Traffic control would be implemented as necessary to ensure construction worker and motorist safety during construction of the proposed off-site improvements. Additionally, there are no major changes proposed to the existing circulation system surrounding the site during project operations, ensuring that emergency evacuation routes remain unaffected. Access to The City Drive South will remain unobstructed during both construction and operation. No further response is required.

Response to Comment S-1-7

As stated in Section 4.21 of the Draft IS/MND, the project site would be served by several OCTA bus routes, and it is reasonable to assume that employees, visitors, and residents may use this mode of alternative transportation to access the proposed project. Based on the project site's proximity to existing bus service, the proposed project would facilitate the use of transit. Because the comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

Response to Comment S-1-8

It is standard practice to utilize a default of 12 feet for lane widths in Synchro, the traffic modeling tool utilized in the project-specific Traffic Impact Analysis (TIA), since the lane widths can only be identified by each lane group rather than individual lanes. The lane widths also do not have a significant bearing on the final results of the Level of Service (LOS) analysis. Nevertheless, to further validate that modifying the lane widths to match the conceptual improvement plan in Synchro would not affect the findings, Year 2050 Plus Project Synchro LOS analysis for the p.m. peak hour was prepared to reflect the existing and/or proposed lane widths per the conceptual intersection design shown on Figure 2-3 of the project-specific TIA. Tables 2 and 3 below present the LOS findings and progression results for both with and without the lane adjustments, respectively. Review of Tables 2 and 3 shows that the LOS results at the four (4) study intersections and the progression results of the corridor remain unchanged when compared to the results identified in Section 10 of the project-specific TIA. As such, no edits to the Draft IS/MND or project-specific TIA are necessary. No further response is required.

Table 2: Year 2050 Buildout Plus Project PM Peak Hour Intersection Capacity Analysis Comparison

Key Intersections	Minimum Acceptable LOS	Year 2050 Buildout Plus Project Traffic Conditions per May 2025 TIA		Year 2050 Buildout Plus Project Traffic Conditions with Revised Lane Widths	
		HCM	LOS	HCM	LOS
1. The City Drive at Outlet Drive	D	9.9 s/v	A	9/9 s/v	A
2. The City Drive at Metropolitan Drive/ Project Driveway No. 1	D	42.7 s/v	D	42.7 s/v	D
3. The City Drive at SR-22 EB Ramps	D	32.5 s/v	C	32.5 s/v	C
4. SR-22 WB Ramps at Metropolitan Drive	D	22.7 s/v	C	22.7 s/v	C

Source: LLG (July 2025).

EB = eastbound

HCM = Highway Capacity Manual

LOS = Level of Service

SR = State Route

TIA = Traffic Impact Analysis

WB = westbound

Table 3: Signal Progression Summary Comparison

Scenario Description	Time Period	Efficiency	Bandwidth (seconds)		Progression Results
			NB	SB	
Year 2050 Buildout Plus Project Traffic Conditions per May 2025 TIA	PM	0.25	25	34	"Good"
Year 2050 Buildout Plus Project Traffic Conditions with Revised Lane Widths	PM	0.25	25	34	"Good"

Source: LLG (July 2025).

NB = northbound

SB = southbound

TIA = Traffic Impact Analysis

Response to Comment S-1-9

It is standard practice to utilize a Peak Hour Factor of 1.0 for buildout traffic conditions because it is assumed that traffic flow is continuous and evenly distributed in the future as a result of optimized signal timings along the corridor. As such, no edits to the Draft IS/MND or project-specific TIA are necessary. No further response is required.

Response to Comment S-1-10

As identified in Figures 5-2 and 5-3 of the project-specific TIA, the proposed project adds 26 trips during the a.m. peak hour and 34 trips during the p.m. peak hour to the State Route (SR)-22 eastbound (EB) freeway. These trips are considered nominal and fall below the Caltrans' threshold of 50 to 100 trips required for a traffic study. Further, the project site would not directly connect to a State facility; nevertheless, an evaluation of the project's potential impacts on queueing at Caltrans' intersections was prepared in order to determine if the project would cause, or contribute towards, slowing or stopped traffic on freeway mainline travel lanes, off-ramps, and State highway lanes that could result in unsafe speed differentials between adjacent lanes. This Caltrans queueing analysis was conducted using Synchro SimTraffic 95th Percentile method for signalized intersections. The results of the queueing analysis are

summarized in Section 10 of the project-specific TIA, which was included as Appendix J to the Draft IS/MND. This section indicates that the vehicular storage provided at The City Drive/SR-22 EB Ramps and SR-22 WB Ramps at Metropolitan Drive intersections is adequate to accommodate the anticipated queues under Year 2050 Buildout traffic conditions with the addition of project traffic. As such, it can be inferred that the proposed project is not anticipated to negatively affect traffic flow on the State Highway System as the existing vehicular storage capacity on the off-ramps are considered adequate, and further would have minimal impact to weaving on SR-22. As such, a further analysis is not necessary, and no further response is required.

Response to Comment S-1-11

If/when the proposed project moves into the plan check design phase and if modifications to the driveway are required, adjustments to the driveway design will be handled at that time not only to address this comment but any other comments that may arise out from review by the City of Orange. As such, no edits to the Draft IS/MND or project-specific TIA are necessary. No further response is required.

Response to Comment S-1-12

The TIA and Draft IS/MND determined no findings of significance to State facilities. Should an unanticipated condition arise leading to findings of significance on State facilities, the County will coordinate with Caltrans District 12 Local Development, as necessary. Because the comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

Response to Comment S-1-13

The County will coordinate with Caltrans to obtain required permits related to any work within Caltrans right-of-way. Because the comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

Response to Comment S-1-14

The County will adhere to all applicable Caltrans review procedures. Because the comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

Response to Comment S-1-15

The County will adhere to all applicable Caltrans Encroachment Permits procedures. Because the comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND, no further response is required.

Response to Comment S-1-16

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

2.2 Local Agencies

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ORANGE COUNTY FIRE AUTHORITY

P. O. Box 57115, Irvine, CA 92619-7115 • 1 Fire Authority Road, Irvine, CA 92602-0125

Brian Fennessy, Fire Chief

(714) 573-6000

www.ocfa.org

L-1

June 18th 2025 (SR 25002831)
Virginia Gomez Senior Planner
Virginia.gomez@ocpw.ocgov.com

Subject: EIR for Workforce re-entry Center

Dear Virginia,

Thank you for the opportunity to review the subject document. The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services response to 23 cities in Orange County and all unincorporated areas. The OCFA operates 78 fire stations throughout Orange County.

L-1-1

Per Title 14 CCR § 15164 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

L-1-2

We believe that the project will have less than a significant impact.

Please contact me at 714-573-6102 if you have any questions.

Sincerely,

Todd Letterman
Assistant Fire Marshal
Planning and Development
toddletterman@ocfa.org
www.ocfa.org

2.2.1 Orange County Fire Authority (OCFA)

Letter Code: L-1

Date: June 18, 2025

Response to Comment L-1-1

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Response to Comment L-1-2

The comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required. As discussed in Response to Section 4.19 of the Draft IS/MND, the project site is served by the Orange City Fire Department (OCFD). Fire services would be provided by OCFD Fire Station No. 6, located 0.3 mile north of the project site at 345 The City Drive South, and OCFD Fire Station No. 5, located approximately 1.5 miles northeast of the project site at 1345 West Maple Avenue. Therefore, the proposed project would be adequately served by existing fire protection facilities and would require no additional expansion or staffing to maintain acceptable service ratios and response times. The Draft IS/MND identified less than significant impacts related to fire protection.



CITY OF ORANGE

COMMUNITY DEVELOPMENT DEPARTMENT

PLANNING DIVISION | (714) 744-7220

L-2

July 1, 2025

VIA ELECTRONIC MAIL:

Ryan.rigali@ocgov.com

Virginia.gomez@ocpw.ocgov.com

County of Orange
County Executive Office/Real Estate/Land Development
Attn: Ryan Rigali
400 W. Civic Center Drive, 5th Floor
Santa Ana CA 92701

SUBJECT: RESPONSE TO NOTICE OF INTENT TO ADOPT AN MND, THE ORANGE COUNTY WORKFORCE REENTRY CENTER PROJECT DRAFT MITIGATED NEGATIVE DECLARATION

Dear Mr. Rigali,

The City of Orange, California is in receipt of the subject notice of intent dated June 2, 2025. This letter serves to provide review comments in reference to the analysis contained within the Draft Mitigated Negative Declaration (MND) for the proposed project provided to support the future development and operation of the Workforce Reentry Center facility.

L-2-1

Please find below comments from the review departments, with contact information included for reference.

1. Police Department

Erik Mendoza, Crime Prevention Specialist

emendoza@orangepd.org, (714) 744-7555

The Orange Police Department (OPD) requests that the County involve OPD in the review of construction plans to allow input on building security standards and Crime Prevention through Environmental Design (CPTED) design concepts. Please also consider the following information for inclusion in the discussion of Police Protection (Page 174):

L-2-2

"To ensure adequate services are provided and to minimize the demands on police services, security and design measures which employ defensible space concepts shall be

utilized throughout the formation of development and construction plans. These measures incorporate the concepts of Crime Prevention through Environmental Design (CPTED), which involves the placement, and orientation of structures, access and visibility of common areas, placement of doors, windows, addressing, lighting and landscaping. CPTED promotes public safety and physical security, and allows residents the ability to monitor activity. The project should also comply with the requirements established in Chapter 15.52 of the Orange Municipal Code (Building Security Ordinance #6-22)."

L-2-2

2. Public Works Department – Water Division (OWD)

Tuan Cao, P.E., Senior Civil Engineer
tcao@cityoforange.org, (714) 288-2492

- a. A Water Improvement Plan is required to be submitted to OWD for review/approval.
- b. Each building will have dedicated domestic, fire, and irrigation services with approved backflow devices.
- c. All services and meters shall be located along The City Drive South within public right of way. On-site water infrastructures shall be privately owned and maintained.
- d. Confirm if the existing 2" service will be abandoned or re-purposed. In the latter case, indicate purpose, building, and add an approved backflow device.

L-2-3

3. Public Works Department – Development Services

Tawnie Schraan, P.E., Associate Civil Engineer
tschraan@cityoforange.org, (714) 744-5528

- a. Trash pickup for the project site may fall under the scope of the City's existing contract with CR&R. If so, the City requests a Trash Recycling and Organics (TRO) form to ensure the project is provided with proper trash enclosures that are constructed in compliance with the City Standard #409.
- b. All off-site work (right-of-way) will need to be performed under an approved encroachment permit and constructed per City Standards, including curb, gutter, sidewalks, driveways, etc.

L-2-4

4. Fire Department

Rosie Flores, Plan Examiner/PIO
rflores@cityoforange.org, (714) 288-2546

Fire Department review is required when a Phase II report is available.

L-2-5

5. Planning Department

Hayden Beckman, Planning Manager
hbeckman@cityoforange.org, (714) 744-7229

According to the conceptual site plan, a trash enclosure is proposed along the frontage of The City Drive South in line with grade level parking. This proposed location does not comply in that it appears to lie within the minimum applicable setback and is directly visible from the street.

L-2-6

Thank you for the opportunity to provide input on the OC Workforce Reentry Center Project at this juncture in the pre-construction environmental review phase. Please contact me at (714) 744-7229 or hbeckman@cityoforange.org should you have any questions or if I may be of assistance.

L-2-7

Regards,

Hayden Beckman
Planning Manager
City of Orange

2.2.2 City of Orange

Letter Code: L-2

Date: July 1, 2025

Response to Comment L-2-1

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Response to Comment L-2-2

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Response to Comment L-2-3

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Response to Comment L-2-4

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. In the event that an encroachment permit is required, the County will adhere to the requirements of the encroachment permit and coordinate with the City of Orange, as necessary. The off-site street improvements in The City Drive right-of-way will be constructed per the City's standards. No further response is required.

Response to Comment L-2-5

The County and its design team have collaborated with the City of Orange Fire Department Plan Examiner to review the project's Fire Access Plan. Additional plan check review by the Orange City Fire Department (OCFD) is planned and is incorporated into the development schedule.

Response to Comment L-2-6

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Response to Comment L-2-7

The comment does not address any substantive issues or raise questions about the environmental analysis or conclusions contained in the Draft IS/MND. No further response is required.

Chapter 3: Errata

This section of the Final Initial Study/Mitigated Negative Declaration (IS/MND) provides text changes that have been made to clarify, amplify, or make minor edits to the Draft IS/MND text for the proposed County of Orange Workforce Reentry Project (proposed project). The changes described in this section are generally minor changes that do not constitute significant new information, change the conclusions of the environmental analysis, or require recirculation of the document (California Environmental Quality Act [CEQA] Guidelines [State CEQA Guidelines] Section 15088.5).

Changes to the Draft IS/MND text are indicated in this section under the appropriate Draft IS/MND section. Deletions are shown with ~~striketrough~~ and additions are shown with underlined text.

3.1 Global Change Pertaining to Construction Duration

Following circulation of the Draft EIR, the Project Applicant updated the construction schedule for the proposed project, resulting in an updated construction duration of 22 months, instead of 19 months as originally stated in the Draft IS/MND. This change would not increase the intensity of construction activities, and therefore would not have a substantial effect on the analysis or conclusions contained in the Draft IS/MND.

3.1.1 Chapter 3.0, Project Description

The final paragraph on Page 47 in Chapter 3.0, Project Description, has been revised to reflect the updated construction duration. This revision was made for clarification only and would not result in substantial changes to the analysis or conclusions contained in the Draft IS/MND.

Project construction is estimated to begin in the summer of 2026 and would last approximately 22 ~~19~~ months, concluding in early 2028. During this period, construction equipment would be staged within the project site. Construction vehicles would access the project site via The City Drive South.

3.1.2 Section 4.7, Air Quality

The final paragraph on Page 75 in Section 4.7, Air Quality, has been revised to reflect the updated construction duration. This revision was made for clarification only and would not result in substantial changes to the analysis or conclusions contained in the Draft IS/MND.

Construction emissions were estimated for the project using the California Emissions Estimator Model (CalEEMod) version 2022.1. As described in Chapter 3, Project Description, project construction is estimated to begin in the summer of 2026 and would last approximately 22 ~~19~~ months, concluding in early 2028. The project would demolish a total of 161,172 sf of building foundations and pavement. As described above, demolition would be limited to only building foundations and pavement. Demolition of the structures that were on-site were demolished as a separate project due to nuisance, health, and safety concerns and is not included as part of the analysis. As provided by the Project Applicant, construction equipment would consist of excavators, dumpers/tenders, loaders, rough terrain forklifts, generator sets, sweeper/scrubbers, trenchers, pumps, air compressors, compactors, paving equipment, and other general construction equipment, which was included in CalEEMod. This analysis assumes the use of Tier 4 Interim construction equipment and that equipment would operate 8 hours per day. In addition, this analysis assumes compliance with SCAQMD Rule 403 and Rule 1113 measures. SCAQMD Rule 1113 addresses emissions from use of architectural coatings. Furthermore, the proposed project would require the import

of 2,000 cubic yards of soil, which was included in CalEEMod. Approximately 60 workers would be required for the pouring of the project's foundation, 26 workers for the grading phase, 250 workers for the building construction phase, 8 workers for utilities/trenching, and 16 workers for exterior improvements and paving. All of these assumptions were also included in CalEEMod. All other construction details are not yet known; therefore, default assumptions (e.g., construction truck trips, fleet activities, construction equipment emission factors) from CalEEMod were used. Construction emissions are summarized in Table 4.7.C below. Appendix A provides CalEEMod output sheets.

3.1.3 Section 4.10, Energy

The fourth paragraph on Page 94 in Section 4.10, Energy, has been revised to reflect the updated construction duration. This revision was made for clarification only and would not result in substantial changes to the analysis or conclusions contained in the Draft IS/MND.

Construction-Period Energy Use. *Project construction is estimated to begin in the summer of 2026 and would last approximately 22 ~~19~~ months, concluding in early 2028. The proposed project would require demolition, site preparation, grading, building construction, utilities/trenching, paving, and architectural coating during construction. However, demolition activities would be limited to only building foundations and pavement.*

APPENDIX A

DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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